

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors

PROMESA

Title III

CASE NO.: 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth, ERS, HTA, and
PBA.

**AECOM CARIBE, LLC'S MOTION TO EXTEND DEADLINE TO FILE A
RESPONSE TO THE "FIVE HUNDRED SEVENTHIETH OMNIBUS
OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM OF
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO,
THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,
AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO
CLAIMS FOR WHICH THE DEBTORS ARE NOT LIABLE (DOCKET 24050)**

TO THE HONORABLE COURT:

COMES NOW, creditor AECOM Caribe, LLP ("AECOM"), by and through its undersigned counsel and very respectfully states and prays:

1. Creditor AECOM Caribe LLP filed its Proof of Claim on June 29, 2018, in the amount of \$243,5556.27. See Claim Number 104150.
2. On April 20, 2023, the Commonwealth of Puerto Rico (hereinafter, the "Commonwealth"), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (hereinafter, "ERS"), the Puerto Rico Highways and Transportation Authority ("HTA"), all together hereinafter referred to as the "Debtors", by and through the Financial Oversight and Management Board for Puerto Rico (hereinafter, the "Oversight Board"), as sole Title III

representative pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (hereinafter, “PROMESA”), filed before this Honorable Court its Five Hundred Seventieth omnibus objection to claims that seek recovery claiming that Debtor is not liable for said claims.

3. In its motion Debtors assert that upon a reasonable review of the Debtors’ records, the invoices underlying AECOM’s claim have either been satisfied, do not provide a valid basis or support for asserting a claim against the Debtors, or no longer represent a valid outstanding liability of the Debtors. Therefore, Debtors request from this Honorable Court to disallow AECOM claim because it does not represent a valid debt of the Debtor and no amounts are due under Commonwealth law.

4. Even though AECOM provided sufficient evidence of the existence of Debtor’s liability in its Proof of Claim, Debtors has disputed the validity of the same through its omnibus objection.

5. AECOM’s deadline to respond to the abovementioned objection is today, Monday May 22, 2023.

6. Due to the documentation that it’s still needed to properly address Debtors’ omnibus objection, AECOM respectfully requests from this Honorable Court an extension of time of thirty days (30), until June 22, 2023, to file its reply.

7. This request is made in good faith and granting the same will not adversely affect any party in the instant case.

8. No prior request for relief sought herein has been made.

WHEREFORE, AECOM Caribe, LLC hereby Requests this Court to take notice of the abovementioned and grant the extension requested.

RESPECTUFLY SUBMITTED.

In San Juan, Puerto Rico, on this 22nd day of May 2023.

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I HEREBY CERTIFY that on this date a copy of this motion has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants as per Master Service List.

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s/ Pedro E. Vázquez Meléndez
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Exhibit A

Proposed Order

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
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as representative of

THE COMMONWEALTH OF PUERTO RICO,
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Debtors

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Title III

CASE NO.: 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth, ERS, HTA, and
PBA.

**ORDER GRANTING AECOM CARIBE, LLC'S MOTION TO EXTEND DEADLINE TO
FILE A RESPONSE TO THE "FIVE HUNDRED SEVENTIETH OMNIBUS
OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM OF
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO,
THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,
AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO
CLAIMS FOR WHICH THE DEBTORS ARE NOT LIABLE (DOCKET 24050)**

Upon consideration of *AECOM Caribe, LLC's Motion to Extend Deadline To File a Response to the Five Hundred Seventieth Omnibus (Substantive) of the Commonwealth Of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Highways And Transportation Authority, and the Puerto Rico Public Buildings Authority To Claims for Which the Debtors are not Liable (Docket 24052)*, and the Court having jurisdiction over this matter under 28 U.S.C. 1331, and under section 306(a)-(b) of PROMESA, 48 U.S.C. § 2167(a); and the court having reviewed the request made by AECOM, it is hereby

ORDERED that AECOM's motion for extension of time is hereby granted in its entirety;

ORDERED that AECOM's deadline to file its response to the *Five Hundred Seventieth Omnibus (Substantive) of the Commonwealth Of Puerto Rico, the Employees Retirement System*

of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Highways And Transportation Authority, and the Puerto Rico Public Buildings Authority To Claims for Which the Debtors are not Liable (Docket 24052), will be June 22, 2023;

ORDERED that this Court shall retain jurisdiction with respect to all matters relating to the interpretation and implementation of this Order.

Dated: May____, 2023.

Honorable Laura Taylor Swain
United States District Judge